

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES OF AMERICA,**

**v.**

**Criminal No. 1:19-cr-59 (LO)**

**DANIEL EVERETTE HALE,**

**Defendant.**

**DEFENDANT'S NOTICE OF FILING OF MEMORANDUM  
OF UNDERSTANDING REGARDING CLASSIFIED INFORMATION**

In accordance with the Protective Order Pertaining to Classified Information entered by this Court on May 23, 2019 (dkt. # 29), defense counsel hereby submits the attached Memorandum of Understanding, executed by Cadence A. Mertz, Esq., regarding the handling of classified information. Pursuant to the Protective Order (Paragraph 15), an executed copy of the attached Memorandum of Understanding will be served upon counsel for the United States.

Respectfully submitted,

DANIEL EVERETTE HALE

By Counsel,

By: /s/ Cadence Mertz  
Cadence A. Mertz  
Va. Bar # 89750  
Assistant Federal Public Defender  
1650 King Street, Suite 500  
Alexandria, Virginia 22314  
(703) 600-0840 (T)  
(703) 600-0880 (F)  
Cadence\_Mertz@fd.org

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2019, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record.

By:     /s/ Cadence Mertz      
Cadence A. Mertz  
Va. Bar # 89750  
Assistant Federal Public Defender  
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**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA

v.

DANIEL EVERETTE HALE,

*Defendant.*

Criminal No. 1:19-CR-59

The Honorable Liam O'Grady

**MEMORANDUM OF UNDERSTANDING  
REGARDING RECEIPT OF CLASSIFIED INFORMATION**

Having familiarized myself with the applicable statutes, regulations, and orders, including but not limited to, Title 18, U.S. Code, Sections 793, 794, 798, and 1924; the Intelligence Identities Protection Act, Title 50, U.S. Code, Section 3121; Title 18, U.S. Code Section 641; Title 50, U.S. Code Section 783; and Executive Order 13526, I understand that I may be the recipient of information and documents that concern the present and future security of the United States and which belong to the United States, and that such documents and information together with the methods and sources of collecting it are classified by the U.S. Government. In consideration for the disclosure of classified information and documents:

(1) I agree that I shall never divulge, publish, or reveal either by word, conduct or any other means, such classified documents and information unless specifically authorized in writing to do so by an authorized representative of the U.S. Government; or as expressly authorized by the Court pursuant to the Classified Information Procedures Act and the Protective Order entered in *United States v. Daniel Everett Hale*, No. 1:19-CR-59.

(2) I agree that this Memorandum will remain forever binding on me.

(3) I have received, read, and understand the Protective Order entered by the U.S. District Court for the Eastern District of Virginia on July 15, 2019, in *United States v. Daniel Everette Hale*, No. 1:19-CR-59, relating to classified information, and I agree to comply with the provisions thereof.

(4) I understand that any prior contractual obligations that may bind me to continue to protect classified information remain in full force and effect, and are not superseded by this Memorandum of Understanding. Additionally, I understand that this Memorandum of Understanding does not absolve me of any criminal or civil penalties that may otherwise be imposed upon me as a result of my unauthorized disclosure of classified information.

  
\_\_\_\_\_  
Esq.

7/15/19  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Esq.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Daniel Everette Hale  
Defendant

\_\_\_\_\_  
Date